

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**ETOIS DAVIS ANDERSON AND
KELLEY LAVALLAIS,**

Plaintiffs,

V.

**MEMORIAL HERMANN
HEALTHCARE SYSTEM,**

Defendant.

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**CIVIL ACTION NO: 4:16-CV-01647**  
**JURY DEMANDED**

## PLAINTIFF'S PROPOSED QUESTIONS TO THE VENIRE PANEL

TO THE HONORABLE JUDGE:

COMES NOW PLAINTIFF ETOIS DAVIS ANDERSON, filing its Proposed Questions to the Venire Panel:

1. Are you familiar with the Plaintiff in this case, Etois Davis Anderson?
2. Are you familiar with the Defendant in this case, Memorial Hermann Healthcare System?
3. Have you, or has any close friend or family member, ever worked for Memorial Hermann Healthcare System?
4. Are you familiar with any of the attorneys who are here today?

5. Have you, or has any close friend or family member, ever been represented by any of the attorneys who are here today? Their names are: Terrence Robinson and Shalini Khan-Ali, representing the Plaintiff, and Kelley Edwards, Nehal Anand, representing the Defendant.
6. Have you ever been discriminated against?
7. Do you believe you have been a victim of discrimination in the workplace because of race, gender, religion, disability, or national origin? Does any close friend or family member believe he or she has experienced discrimination by an employer?
8. The Plaintiff in this case believes that the Defendant treated her differently because of her race. What kinds of experiences have you had, or heard about from someone close to you, that lead you to believe some people may not be treated fairly on the job because of their race?
9. Have you ever been accused of being discriminatory?
10. Do you think our laws against discrimination are not tough enough, too tough, or just about right?
11. What is your general opinion of discrimination lawsuits (i.e., mostly frivolous, mostly meritorious, etc.)?
12. Have you been exposed to persons who exhibit or have exhibited racial, sexual, religious, and/or other ethnic prejudice? [Please explain]
13. Do you look at a person's race, sex, national origin, religious affiliation in determining whether they would be a good employee or not?
14. Do you have a problem working with someone who is not of your same race?
15. Have you ever manage or supervised others at your job? If so, do you prefer to supervise persons of your same race?

16. If so, have you ever had to discipline or terminate someone?
17. Have you ever been terminated for something you didn't think was fair?
18. Have you ever been in an employment dispute?
19. Have you ever made a mistake at work?
20. How long do you think your mistake at work should be held against you?
21. Have you seen other employees at work make similar mistakes that you made but they were disciplined differently?
22. Have you ever had to file a grievance at work?
23. Have you ever had to file an EEOC charge.
24. Do you agree or disagree with this statement: Discrimination/harassment claims are just excuses to cover up other problems people are having on the job.
25. Do you agree or disagree with this statement: Discrimination [harassment] is a thing of the past.
26. Some people feel that employers should be responsible for their action and other people feel that employers should not be held responsible for their actions. How do you feel about this?

Respectfully Submitted,

TB Robinson Law Group, PLLC

/s/ Terrence B. Robinson

Terrence B. Robinson, Attorney in Charge for Plaintiff

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of October, 2017, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system and served on all attorney(s) and/or parties of record via the CM/ECF service.

A handwritten signature in blue ink, appearing to read "T-B. Robin", is written above a horizontal line.

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Terrence B. Robin